

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re:

Joseph G. DuMouchelle Fine & Estate
Jewelers, L.L.C.,

Debtor.

Chapter 7
Case No. 19-56239
Hon. Phillip J. Shefferly

**CREDITOR JOHN RAGARD'S CONCURRENCE WITH
EMERGENCY MOTION BY PETITIONING CREDITORS
TO APPOINT INTERIM TRUSTEE UNDER 11 U.S.C. §303(g)**

CREDITOR John Ragard, by and through his counsel, states his *Concurrence With Emergency Motion by Petitioning Creditors to Appoint Interim Trustee Under 11 U.S.C. §303(g)* as follows:

1. On November 17, 2019, the instant involuntary Chapter 7 bankruptcy petition was filed against Joseph DuMouchelle Fine & Estate Jewelers, L.L.C., the wholly owned subsidiary of Joseph DuMouchelle and Melinda Adducci.
2. Ragard holds claims against the bankruptcy estate in the approximate amount of \$5,500,000.00, relating to the unpaid balance of three separate promissory notes executed by Debtor Joseph B. DuMouchelle (“DuMouchelle”).
3. The money was delivered to Debtor for the purported purpose of purchasing rare and valuable jewelry. DuMouchelle’s obligations under two of the promissory are secured by the purchased jewelry. The money was never paid back

and it is questionable whether the borrowed money was used to purchase the subject jewelry, to the extent the jewelry existed at all.

4. It is imperative that an interim Chapter 7 trustee be appointed in this case to preserve the property of the estate and prevent loss to the estate. Therefore, Ragard concurs in the relief requested in the Petitioning Creditors' Emergency Motion by Petitioning Creditors to Appoint Interim Trustee Under 11 U.S.C. §303(g) (the "Motion") [Docket No. 11].

WHEREFORE, Creditor John Ragard respectfully requests that this Court grant Motion and grant such other and further relief as is just and equitable.

Respectfully submitted,

MADDIN, HAUSER, ROTH & HELLER, P.C.

By: /s/ David M. Eisenberg

David M. Eisenberg (P68678)

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DATED: November 22, 2019

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CERTIFICATE OF SERVICE

I certify that on November 22, 2019, Creditor John Ragard's Concurrence with Emergency Motion by Petitioning Creditors to Appoint Interim Trustee under 11 U.S.C. §303(g) and this Certificate of Service were filed with the Clerk of the Court for the U.S. Bankruptcy Court, Eastern District of Michigan using the ECF system and a copy of said documents were sent to all attorneys of record herein using said ECF system on said date.

MADDIN, HAUSER, ROTH & HELLER, P.C.

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DATED: November 22, 2019